

City of Las Vegas

400 Stewart Avenue
Las Vegas, Nevada 89101

AFFIRMATIVE ACTION PROGRAM FOR INDIVIDUALS WITH DISABILITIES AND VETERANS

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EQUAL EMPLOYMENT OPPORTUNITY POLICY
41 C.F.R. Section 60-741.44(a); 60-250.44(a); 60-300.44(a)

It is the policy at The City of Las Vegas (The City) to provide equal employment and advancement opportunities to all qualified individuals. To achieve this goal, The City is dedicated to taking affirmative action to employ and advance in employment, qualified disabled persons, disabled veterans, recently separated veterans, Armed Forces service medal veterans, other protected veterans, in compliance with Section 503 of the Rehabilitation Act of 1973, as amended, 29 U.S.C 793, and Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended, 38 U.S.C. 4212 ("Section 4212" or "VEVRAA"). All personnel actions, including compensation, benefits, recruitment, hiring, training, and promoting persons in all job titles, will be administered without regard to disability, or other protected veteran status, and all employment decisions are based solely on valid job requirements. In addition, employees and applicants are protected from harassment, threats, coercion, intimidation, interference or discrimination for:

1. Filing a complaint;
2. Assisting or participating in an investigation, compliance review, hearing, or any other activity under Section 503 of the Rehabilitation Act of 1973, as amended, 29 U.S.C. 793, Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended, 38 U.S.C. 4212 or any other law requiring equal opportunity for disabled persons and other protected veterans;
3. Opposing any practice made unlawful by the Act or any other law requiring equal opportunity for disabled persons and other protected veterans; or
4. Exercising any other right protected by these Acts or the implementing regulations.

This EEO policy has the full support of the City Manager, who has assigned responsibility for its implementation to the EEO Coordinator. The City has designed and implemented an audit and reporting system to monitor and maintain its compliance with the Acts.

Our goal is the utilization of qualified disabled persons and covered veterans in as many levels of position classifications as practicable. As provided in United States Code 38 USC 4212, 29 U.S.C 793, and Code of Federal Regulations 60-250, 60-300 and 60-741, the required policies, practices, and procedures are integrated into this Affirmative Action Program. A copy of our Equal Employment Opportunity statement is posted which reaffirms our commitment to qualified disabled individuals and covered veterans. This program is available for review upon request by any applicant or employee by contacting the EEO Coordinator during regular business hours. Notice of this availability for review is posted for applicants and employees.

REVIEW OF PERSONNEL PROCESSES
41 C.F.R. Section 60-741.44(b); 60-250.44(b); 60-300.44(b)

The City will periodically review its employment procedures to ensure careful, thorough and systematic consideration of the job qualifications of known disabled individuals and covered veteran applicants for job vacancies filled either by hiring or promotion, and for all training opportunities offered or available. This review shall also ensure that personnel procedures do not stereotype disabled persons, and other protected veterans in a manner, which limits their access to all jobs for which they are qualified. When covered veterans are considered for employment, only that portion of the individual's military record, including discharge papers, that is relevant to the requirements of the position will be considered.

To facilitate compliance with this requirement, the following procedures have been implemented:

1. The application or personnel form of each known applicant with a disability or each known covered veteran should be annotated to identify each vacancy for which the applicant was considered and will be retrievable for review for use in investigations and internal compliance activities;
2. The application or personnel form of each known applicant with a disability or each known covered veteran should include the identification of each promotion and training program for which that employee was considered;
3. When an employee or applicant with a known disability or a covered veteran status, is rejected for employment, promotion, or training, a statement of the reason should be appended to the personnel file along with a description of any reasonable accommodation considered.
4. When an employee or applicant is selected for hire, promotion, or training, and reasonable accommodation has been undertaken to enable the selection of an employee or applicant with a disability or special disabled veteran, the applicant form or personnel record should contain a description of the reasonable accommodation.

PHYSICAL AND MENTAL QUALIFICATIONS
41 C.F.R. Section 60-741.44(c); 60-250.44(c); 60-300.44(c)

At least annually, The City will review all physical and mental job qualification requirements as openings occur, to ensure to the extent qualification requirements tend to screen out qualified disabled individuals or disabled Veterans, they are job-related and consistent with business necessity and the safe performance of the job.

To the extent that physical or mental job qualification requirements tend to screen out qualified disabled individuals or disabled veterans in the selection of employees or applicants for employment or other changes in employment status such as promotion or training, The City assures that the requirements are related to the specific job(s) for which the individual is being considered and are consistent with The City's necessity and the safe performance of the job.

REASONABLE ACCOMMODATION
41 C.F.R. Section 60-741.44(d), 60-250.44(d); 60-300.44(d)

The City makes reasonable accommodations to the physical and mental limitations of employees or applicants to the extent that such accommodations do not impose an undue hardship on the conduct of its business. When an employee with a known disability is having significant difficulty performing his or her job and it is reasonable to conclude that the performance problem may be related to the known disability, the employee will be notified of the performance problem and asked if the problem is related to the disability. If the employee indicates the performance problems are related to his or her disability, the employee will be asked if reasonable accommodation is needed.

The City makes reasonable accommodation to the special needs of disabled individuals and disabled veterans including access to the building, utilization of rest room facilities, and mobility requirements within the building and parking locations.

HARASSMENT
41 C.F.R. Section 60-741.44(e); 60-250.44(e); 60-300.44(e)

The City will develop and maintain procedures to ensure that its employees are not harassed because of a disability or status as a special disabled veteran, or other covered veteran.

EXTERNAL DISSEMINATION OF POLICY
41 C.F.R. Section 60-741.44(f), 60-250.44(f); 60-300.44(f)

The City shall undertake appropriate outreach and positive recruitment activities that are reasonably designed to effectively recruit qualified disabled and special disabled veterans, and other covered veterans, such as the following:

1. The City will notify all applicants of the EEO policy and invite them to self-identify after an offer of employment but before the person begins work. Application forms state our commitment to equal employment opportunity. Notices to recruitment sources and all employment advertisements state this EEO policy.
2. Recruitment programs will be established with the State Job Services and other recruiting sources for disabled individuals and covered veterans such as: The Department of Veterans Affairs, veteran's counselors and coordinators on college campuses, service officers of national veterans' groups active in the area, and local veterans' groups and veterans' service centers to provide assistance in locating qualified applicants, including those not currently in the workforce, where applicable and feasible. All employment openings (except executive and top management, positions that will be filled from within, and positions lasting three days or less) will be listed at the appropriate state employment services office. Formal briefing sessions and facility tours may be conducted with representatives from recruiting sources to explain current and future job openings, position descriptions, worker specifications, and the selection process. Follow-up with these resources and feedback on disposition of applicants should be conducted when appropriate.
3. All advertisements seeking applicants for employment will identify The City as an "equal opportunity employer."
4. The City will incorporate the Equal Opportunity Clause regarding disabled individuals, disabled veterans, and other protected veterans in its purchase orders, leases and contracts as required by law, executive order and regulation. Written notification of the Equal Opportunity Policy will be sent to all subcontractors, vendors, and suppliers requesting appropriate action on their part.
5. The City will develop internal communication of these outreach efforts in a manner that fosters understanding, acceptance, and support among executive management, supervisors, and all other employees.
6. Meaningful contacts will be established with disabled individuals and veteran's service organizations for such purposes as advice, technical assistance, and referral of potential employees. Such assistance may consist of advice concerning proper placement, recruitment, training, and reasonable accommodation.
7. Recruitment programs established with schools will incorporate efforts to reach students with disabilities. Efforts may be made to participate in work-study programs with rehabilitation facilities and schools specializing in training or educating individuals with disabilities.
8. Efforts will be made to include individuals with disabilities when employees are pictured in consumer, promotional or help wanted advertisements.
9. When the position they apply for is unavailable, good faith efforts will be made to consider covered veterans and applicants with known disabilities for all available positions for which they may be qualified, to the extent practicable.

10. Special disabled veterans and other protected veterans are encouraged to participate in career days, youth motivation programs, and related activities in their communities.

INTERNAL DISSEMINATION OF POLICY
41 C.F.R. Section 60-741.44(g), 60-250.44(g); 60-300.44(g)

The City has developed the following internal procedures to communicate its obligation to engage in affirmative action efforts to employ and advance in employment qualified individuals with disabilities, disabled veterans, and other protected veterans. These procedures are designed to foster understanding, acceptance, and support among executive, management, supervisory and other employees and to encourage such persons to take the necessary actions to meet this obligation.

1. The City Notices. The EEO policy statement will be posted on the employee bulletin board in a manner and place that ensures individuals with disabilities are informed of its contents. This notice will state the name of the EEO Coordinator, the support of top-level management toward this policy, and to whom questions, comments, or complaints should be directed. A statement will be included that employees are protected from coercion, intimidation, interference or discrimination for filing a complaint or assisting in an investigation under the Acts. All required state and federal EEO notices are also posted on bulletin boards.
2. Meetings. Our overall commitment, top-level management support, and specific implementation of the plan are discussed periodically with all management personnel. Periodic meetings may also be held with all employees to discuss our commitment to this policy and the responsibilities of individual employees. Our policy will also be discussed in employee orientation and any management training programs.
3. Notice of Affirmative Action Plan. The City affirmative action plan is available in the office of the EEO Coordinator for employee review.
4. The City publications. This policy and articles on accomplishments of disabled workers will be publicized in any City's newspapers, magazines, annual reports, or other publications when appropriate. When employees are featured in publications, special disabled veterans will be included. This policy will also be included in any employee handbook or policy manual.
5. Union Contracts. A non-discrimination clause will be included in any union contracts and any such contract will be reviewed to ensure that they are non-discriminatory.

AUDIT & REPORTING SYSTEM
41 C.F.R. Section 60-741.44(h); 60-250.44(h); 60-300.44(h)

The City has designed and implemented an audit and reporting system that will:

- 1) Measure the effectiveness of the affirmative action program.
- 2) Indicate any need for remedial action.
- 3) Determine the degree to which the objectives have been attained.
- 4) Determine whether individuals with known disabilities have had the opportunity to participate in all company sponsored educational, training, recreational and social activities.
- 5) Measure compliance with the affirmative action program's specific obligations.

Where the affirmative action program is found to be deficient, corrective action will be taken to bring the program into compliance.

The above-cited items will be discussed during our meetings with all management personnel. The results of this review and corrective actions will be reported to top management.

RESPONSIBILITY FOR IMPLEMENTATION
41 C.F.R. Section 60-741.44(i); 60-250.44(i); 60-300.44(i)

The EEO Coordinator has been designated to direct the activities of the Affirmative Action Program and has the full support of the City Manager in carrying out The City's Affirmative Action Policy. The EEO Coordinator will be responsible for:

1. Developing policy statements, affirmative action programs, and internal and external communication to include discussions with officials, managers, supervisors and employees to ensure the policies are followed;
2. Advising managers and supervisors that their work performance is evaluated, in part, on the basis of their affirmative action efforts;
3. Identifying and discussing any problem areas with management, and developing solutions;
4. Serving as a liaison between The City and community groups, other governmental agencies and vocational rehabilitation organizations;
5. Maintaining an audit and reporting system to monitor the progress of the Affirmative Action Program;
6. Informing management of the latest developments in the affirmative action and equal employment opportunity area;
7. Serving as a liaison between The City and organizations for disabled persons and covered veterans;
8. Assisting in career counseling for disabled and covered veteran employees;
9. Ensuring that the policy statement and required posters are posted on bulletin boards; and
10. Ensuring that employees placed through these policies are not harassed.

TRAINING

41 C.F.R. Section 60-741.44(j), 60-250.44(j); 60-300.44(j)

All personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes will be trained to ensure knowledge of equal employment opportunity and affirmative action laws. Educational and training programs may be offered to employees to assist in their personal development as well as to increase their skills and ability to perform on the job. The City will continue to ensure that all employees have the opportunity to participate in such programs without regard to disabled or veteran status.